

EXHIBIT 55

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF NEW JERSEY

3 -----
4 IN RE JOHNSON & JOHNSON)
5 TALCUM POWDER PRODUCTS) MDL NO.
6 MARKETING, SALES PRACTICES,) 16-2738(FLW)(LHG)
7 AND PRODUCTS LIABILITY)
8 LITIGATION)
9 -----

10 IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
11 STATE OF MISSOURI

12 VALERIE SWANN,)
13)
14 Plaintiff,)
15)
16 v.) Cause No.
17) 1422-CC09326-03
18 JOHNSON & JOHNSON, et al.,)
19)
20 Defendants.)
21 -----

22 — — —
23 Tuesday, September 14, 2021
24 — — —

25 Oral Deposition of JUDITH WOLF, M.D.,
VOLUME 2, held at the Fairmont Hotel, 101 Red
River Street, Austin, Texas, commencing at
8:53 a.m. CDT, on the above date, before
Michael E. Miller, Fellow of the Academy of
Professional Reporters, Certified Court
Reporter, Registered Diplomate Reporter,
Certified Realtime Reporter and Notary
Public.

26 — — —
27 GOLKOW LITIGATION SERVICES
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29 deps@golkow.com

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1 -----

2 PROCEEDINGS

3 September 14, 2021, 8:53 a.m. CDT

4 -----

5 JUDITH WOLF, M.D.,

6 having been previously duly sworn,

7 testified as follows:

8 -----

9 EXAMINATION

10 -----

11 BY MR. ZELLERS:

12 Q. Good morning, Dr. Wolf.

13 A. Good morning.

14 Q. I'd like to ask you some

15 questions about Lynda Bondurant and the case

16 that's been filed on her behalf.

17 A. Okay.

18 Q. You have prepared a

19 case-specific report regarding Ms. Bondurant;

20 is that right?

21 A. Yes.

22 Q. We marked that yesterday as

23 Deposition Exhibit 6, and you have that in

24 front of you; is that right?

25 A. Yes.

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1 Q. That report contains your

2 case-specific opinions with regard to

3 Ms. Bondurant; is that right?

4 A. Yes.

5 Q. The first 21 pages of

6 Exhibit 6, your report, is the same as the

7 general amended report that we discussed

8 yesterday, correct?

9 A. Yes.

10 Q. Ms. Bondurant had clear-cell

11 carcinoma; is that right?

12 A. Clear-cell carcinoma of the

13 ovary, yes.

14 Q. And it's your opinion, as

15 stated on pages 22 to 24 of your report,

16 Exhibit 6, that talcum powder is a

17 substantial contributing cause of

18 Ms. Bondurant's clear-cell cancer of the

19 ovary; is that right?

20 A. Yes.

21 Q. You did not identify any other

22 contributing causes of Ms. Bondurant's

23 clear-cell ovarian cancer; is that right?

24 A. I'm just relooking just to make

25 sure that -- she did have a family history --

<p style="text-align: right;">Page 534</p> <p>1 A. I don't think there's anything 2 else in her history that I identified. 3 Smoking would be mucinous 4 cancer, and she did not have mucinous cancer. 5 Q. In Ms. Bondurant's case and in 6 any case, we have the possibility of factors 7 that are, as of now, unknown, correct? 8 That's true for any -- 9 A. All cancers, yeah. 10 Q. Okay. I asked you this 11 yesterday and I don't think we ever reached 12 an agreement, but new question. 13 In Ms. Bondurant's case, are 14 you able to ascribe a percentage that talc 15 caused her ovarian cancer as compared to a 16 percentage that family history caused her 17 ovarian cancer as compared to a percentage 18 that endometriosis caused her ovarian cancer? 19 DR. THOMPSON: Object to form. 20 A. I don't know how I would 21 ever -- I don't know how to answer that 22 question because I don't think of it as a 23 percentage. 24 Are you -- so I guess I'm still 25 not understanding your question.</p>	<p style="text-align: right;">Page 536</p> <p>1 their proportionate cause was of 2 Ms. Bondurant's ovarian cancer? 3 DR. THOMPSON: Object to form. 4 A. That is not something that 5 makes any clinical sense to me, so I'm not 6 sure what you're asking. And I would never 7 say, well, it's a 20% chance that this caused 8 it and a 20% that that caused it and a 20% 9 chance that that caused it. That sounds like 10 that's what you're asking me. 11 BY MR. ZELLERS: 12 Q. Well, let me try to do a little 13 better. And if you can't -- I just want to 14 know if that's an opinion that you either 15 have or may have. 16 Can you attribute or break down 17 among the different risk factors for ovarian 18 cancer, and in Ms. Bondurant's case, we've 19 got talc use, we've got family history and 20 possibly endometriosis. 21 And your opinion is that talc 22 use is a cause, family history may be a 23 cause, and endometriosis, if it was verified, 24 may be a cause, fair? 25 A. Yes.</p>
<p style="text-align: right;">Page 535</p> <p>1 BY MR. ZELLERS: 2 Q. I'm asking -- my job today is 3 to ask you your opinions. 4 A. Yes. 5 Q. So do I understand correctly 6 that, in your opinion, you cannot ascribe a 7 percentage cause of talc to Ms. Bondurant's 8 ovarian cancer or a percentage cause of 9 family history to her ovarian cancer or a 10 percentage cause that endometriosis caused 11 her ovarian cancer? 12 A. Are you asking me to rank what 13 I think the causes are? 14 Q. Well, here's what I'm asking 15 you to do. In Ms. Bondurant's case, she has 16 ovarian cancer. 17 A. Yes. 18 Q. Did talc contribute 20% to her 19 ovarian cancer? Did it contribute 60% to her 20 ovarian cancer? Similarly, did family 21 history contribute 20% to her ovarian cancer 22 or 40 or 60%? Did endometriosis contribute 23 20 or 30 or 40%? 24 Are you able to give an opinion 25 among the different risk factors as to what</p>	<p style="text-align: right;">Page 537</p> <p>1 Q. And I think you told me earlier 2 that your assumption, when you looked at 3 these cases, is: If there is an identifiable 4 risk factor, that it has some role in causing 5 the ovarian cancer, correct? 6 A. Yes. 7 Q. So among, in Ms. Bondurant's 8 case -- in Ms. Bondurant's case, among the 9 risk factors, are you able to say that you 10 think talc was 50% responsible for her 11 ovarian cancer and family history was 30% 12 responsible and endometriosis is 20% 13 responsible, or is that not something that 14 you think, you know, as an expert, that you 15 can ascribe percentages of the risk factors 16 to the cause of her cancer? 17 DR. THOMPSON: Object to form. 18 A. In an individual patient, I 19 would not assess percentage of cause from 20 different individual risk factors. 21 BY MR. ZELLERS: 22 Q. Go back to the -- is it the 23 Wentzensen article? That's the 2021 article 24 that we marked a bit ago that was written 25 with O'Brien as a coauthor.</p>

<p style="text-align: right;">Page 726</p> <p>1 MR. ZELLERS: Objection, form.</p> <p>2 A. It includes epithelial ovarian</p> <p>3 cancer, which would include all subtypes.</p> <p>4 BY DR. THOMPSON:</p> <p>5 Q. And then let's go to another</p> <p>6 place. I don't have the page number, so let</p> <p>7 me look this up real quick. Okay.</p> <p>8 DR. THOMPSON: My Internet went</p> <p>9 out on me. Sorry.</p> <p>10 (Pause.)</p> <p>11 BY DR. THOMPSON:</p> <p>12 Q. Okay. Let's go to page 43.</p> <p>13 The paragraph that begins with "Based on the</p> <p>14 available data."</p> <p>15 A. (Nods head.)</p> <p>16 Q. Based on the available data,</p> <p>17 ovarian cancer was identified as a critical</p> <p>18 health effect for the perineal route of</p> <p>19 exposure to talc, and a long discussion of</p> <p>20 why that is.</p> <p>21 Data from a meta-analysis of</p> <p>22 epidemiological studies indicate a consistent</p> <p>23 and statistically significant positive</p> <p>24 association between perineal exposure to talc</p> <p>25 and ovarian cancer, with several references.</p>	<p style="text-align: right;">Page 728</p> <p>1 CERTIFICATE</p> <p>2 I, MICHAEL E. MILLER, Fellow of</p> <p>3 the Academy of Professional Reporters,</p> <p>4 Registered Diplomate Reporter, Certified</p> <p>5 Realtime Reporter, Certified Court Reporter</p> <p>6 and Notary Public, do hereby certify that</p> <p>7 prior to the commencement of the examination,</p> <p>8 JUDITH WOLF, M.D. was duly sworn by me to</p> <p>9 testify to the truth, the whole truth and</p> <p>10 nothing but the truth.</p> <p>11 I DO FURTHER CERTIFY that the</p> <p>12 foregoing is a verbatim transcript of the</p> <p>13 testimony as taken stenographically by and</p> <p>14 before me at the time, place and on the date</p> <p>15 hereinbefore set forth, to the best of my</p> <p>16 ability.</p> <p>17 I DO FURTHER CERTIFY that pursuant</p> <p>18 to FRCP Rule 30, signature of the witness was</p> <p>19 not requested by the witness or other party</p> <p>20 before the conclusion of the deposition.</p> <p>21 I DO FURTHER CERTIFY that I am</p> <p>22 neither a relative nor employee nor attorney</p> <p>23 nor counsel of any of the parties to this</p> <p>24 action, and that I am neither a relative nor</p> <p>25 employee of such attorney or counsel, and</p> <p>that I am not financially interested in the</p> <p>action.</p> <p>MICHAEL E. MILLER, FAPR, RDR, CRR Fellow of the Academy of Professional Reporters NCRA Registered Diplomate Reporter NCRA Certified Realtime Reporter Certified Court Reporter</p> <p>Notary Public in and for the State of Texas My Commission Expires: 7/9/2024</p> <p>Dated: September 16, 2021</p>
<p style="text-align: right;">Page 727</p> <p>1 Would the ovarian cancer</p> <p>2 referred to in that clause include all the</p> <p>3 subtypes of epithelial ovarian cancer?</p> <p>4 MR. ZELLERS: Objection, form.</p> <p>5 A. Yes, because those papers that</p> <p>6 they discussed, many of them include all</p> <p>7 subtypes or don't separate and just call it</p> <p>8 epithelial ovarian cancer.</p> <p>9 BY DR. THOMPSON:</p> <p>10 Q. And the last sentence: Given</p> <p>11 that there's a potential for perineal</p> <p>12 exposure to talc from the use of various</p> <p>13 self-care products, a potential concern for</p> <p>14 human health has been identified.</p> <p>15 And that would include all the</p> <p>16 subtypes of epithelial ovarian cancer?</p> <p>17 MR. ZELLERS: Objection, form.</p> <p>18 BY DR. THOMPSON:</p> <p>19 Q. Is that right?</p> <p>20 A. Yes.</p> <p>21 DR. THOMPSON: That's all.</p> <p>22 MR. ZELLERS: I have no further</p> <p>23 questions. Thank you.</p> <p>24 THE WITNESS: Thank you.</p> <p>25 (Time noted: 4:41 p.m. CDT)</p>	<p style="text-align: right;">Page 729</p> <p>1 INSTRUCTIONS TO WITNESS</p> <p>2</p> <p>3 Please read your deposition over</p> <p>4 carefully and make any necessary corrections.</p> <p>5 You should state the reason in the</p> <p>6 appropriate space on the errata sheet for any</p> <p>7 corrections that are made.</p> <p>8 After doing so, please sign the</p> <p>9 errata sheet and date it.</p> <p>10 You are signing same subject to</p> <p>11 the changes you have noted on the errata</p> <p>12 sheet, which will be attached to your</p> <p>13 deposition.</p> <p>14 It is imperative that you return</p> <p>15 the original errata sheet to the deposing</p> <p>16 attorney within thirty (30) days of receipt</p> <p>17 of the deposition transcript by you. If you</p> <p>18 fail to do so, the deposition transcript may</p> <p>19 be deemed to be accurate and may be used in</p> <p>20 court.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>